

DATA RETENTION POLICY

Definitions:

The Company = Serply Recruitment Ltd

1. Purpose

The purpose of this Policy is to ensure that necessary records and documents of the Company are adequately protected, securely maintained, and appropriately disposed of when no longer required. It also helps employees understand their obligations in retaining and deleting electronic documents – including emails, website files, text files, sound and video files, PDF documents, and all Microsoft Office or other formatted files.

This Policy supports compliance with the **UK General Data Protection Regulation (UK GDPR)**, the **Data Protection Act 2018**, and all other relevant legislation.

2. Policy

This Policy represents the Company's approach to the retention and disposal of physical and electronic records.

Records shall be maintained only as long as necessary for operational, legal, or regulatory purposes and disposed of in a secure and confidential manner once retention periods expire.

3. Administration

Appendix A sets out the Record Retention Schedule, approved as the initial maintenance, retention, and disposal schedule for the Company.

The Company will:

- Review and update the schedule annually;
- Monitor changes in legislation and best practice;
- Ensure staff awareness of record-management responsibilities; and
- Audit compliance with this Policy.

Retained information may only be used for the purpose for which it was originally collected. Processing must always be lawful, fair, and transparent in accordance with UK GDPR.

4. Suspension of Record Disposal in Event of Legal Proceedings or Claims

Information must be preserved beyond scheduled limits where:

- Legal proceedings, investigations, or statutory obligations require retention;
- A crime is suspected or detected;
- The information relates to an entity in liquidation or receivership where a debt is due;
- The information may have historical significance confirmed by management; or
- Retention is necessary to protect or defend the Company's legal rights.

If there is any doubt as to whether disposal should be suspended, the Administrator must be consulted, and legal advice obtained.

The Administrator shall promptly inform all relevant staff of any suspension and the scope of affected records.

5. Security of Personal Information

- The Company will take reasonable technical and organisational measures to prevent loss, misuse, or unauthorised alteration of personal data.
- Personal data will be stored on secure password- and firewall-protected servers, with encryption applied where appropriate.
- Transmission of data over the internet is inherently insecure; however, the Company implements appropriate security and encryption to minimise risk.
- Users are responsible for keeping login credentials secure. The Company will only request credentials where necessary for system access.

6. Amendments

- This Policy will be reviewed and, if required, updated annually or following legislative change.
- The most recent approved version will be published internally and on request for audit or compliance purposes.

7. Applicability

This Policy applies to all physical and electronic records generated in the Company's operations, including originals and reproductions, and to all staff handling such records.

This Policy was reviewed and approved by a Director of Serply Recruitment Ltd on 15 March 2026.

APPENDIX A – RECORD RETENTION SCHEDULE

The schedule below sets minimum retention periods in compliance with UK legislation and regulatory guidance.

A. ACCOUNTING AND FINANCE

Record Type	Retention Period
Annual audit reports and financial statements	Permanent
Audit work papers and supporting documents	7 years after audit completion
Annual plans and budgets	7 years
Bank statements and cancelled cheques	7 years

Record Type	Retention Period
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Employee expense reports	7 years
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Interim financial statements	7 years
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B. CONTRACTS

Record Type: Contracts and related correspondence (including proposals and supporting documents)

Retention Period: 7 years after contract expiration or termination.

C. CORPORATE RECORDS

Record Type

1 - Board and committee minutes, articles of association, registers of directors

2 - Licences and permits

Retention Period

1 - Permanent

2 - Current plus 7 years after expiry; permanent where law requires

D. CORRESPONDENCE AND INTERNAL MEMORANDA

Routine correspondence and notes with no ongoing value – retain **5 years**.

Non-routine correspondence with business, legal or historical value –

retain **for the same period as the related project file** or **permanently** if of continuing importance.

E. PERSONAL INFORMATION

Personal data is kept only as long as necessary for its purpose.

Typical deletion periods:

Record Type	Retention Period
Website analytics / IP logs	2 years
Website registrations / profiles	2 years
Marketing subscriptions	Until consent withdrawn
Candidate or client records	2 years after last contact (unless placed)
Placement & work history	6 years after assignment or employment ends

Record Type	Retention Period
Agency worker (PAYE) records	6 years after final payment
Email metadata	1 year after deletion
Website posts	5 years
Right-to-work and ID documents	2 years after employment ends
Consent records	Review every 2 years (12 months for perm candidates)

Documents may be retained longer if required by law or for legal claims.
Daily back-ups secure all current databases for continuity and disaster recovery.

F. ELECTRONIC DOCUMENTS AND EMAIL

- Routine emails deleted after 12 months unless flagged for longer retention.
- Archived emails kept 90 days then permanently deleted.
- Key client or candidate emails stored in the CRM system for the same period as the related assignment.
- Where paper and digital copies exist, the electronic record is the official version.

H. INSURANCE RECORDS

Record Type	Retention Period
Insurance certificates	Permanent
Claims files and correspondence	7 years after settlement (minimum); permanent for injury cases
Policies (active and expired)	Minimum 7 years after expiry

I. LEGAL FILES AND PAPERS

Record Type	Retention Period
Legal opinions and memoranda	7 years after case closure
Litigation files	1 year after expiration of appeal period
Court orders and settlements	Permanent

J. MISCELLANEOUS

Record Type	Retention Period
Material of historical or reference value	Permanent

Record Type	Retention Period
Policies and procedure manuals	Current version plus revision history
Annual reports and company publications	Permanent

K. PERSONNEL RECORDS

Record Type	Retention Period
Employee personnel files and training records	6 years after termination
Employment contracts (individual)	6 years after termination
Recruitment records and advertising	1 year from hiring decision
Disciplinary and grievance records	6 years after settlement or employment end

L. TAX RECORDS

Record Type	Retention Period
Tax-exemption documents and correspondence	Permanent
Tax bills, receipts, and statements	7 years
Tax returns and annual information returns	Permanent
Sales and VAT records	7 years
Payroll records and P60/P45 summaries	6 years after tax year end

Approved by the Director of Serply Recruitment Ltd on **15 March 2026**

Next Review Date: March 2027